

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In Re:

CASE NO. 13-10283
Chapter 13

CINDY LOU RICH-SHEETS,
Debtor.

MOTION TO MODIFY CHAPTER 13 PLAN

CINDY LOU RICH-SHEETS, debtor in the above captioned Bankruptcy proceeding by her counsel, Michael J. Toomey, Esq., as and for a motion to modify the debtor's Chapter 13 plan in case number 09-12048 states the following grounds therefore:

1. That the debtor filed the Chapter 13 Bankruptcy Petition on February 7, 2013 in the United States Bankruptcy Court for the Northern District of New York.
2. That the Court has jurisdiction to entertain this Motion.
3. That the debtor is seeking to modify her Chapter 13 Plan to reduce her regular monthly payments from \$1,000.00 to \$500.00 beginning with the February, 2014 payment with a lump sum payment on the 60th month.
4. That any default under the current plan be waived.

WHEREFORE, debtor requests that the Court allow her to modify her Chapter 13 plan to reduce her regular monthly payments from \$1,000.00 to \$500.00 beginning with the February, 2014 payment with a lump sum payment on the 60th month; that any default under the current plan be waived; and for such other and further relief as the Court may deem just and proper.

Date: May 27, 2014

/s/Michael J. Toomey

MICHAEL J. TOOMEY, ESQ.

Attorney for debtor

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To:

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Chapter 13 Trustee

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U.S. Trustee

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Albany, NY 12207

All Creditors